

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: TESTOSTERONE REPLACEMENT  
THERAPY PRODUCTS LIABILITY LITIGATION

MDL No. 2545

Master Docket Case No. 1:14-cv-  
01748

Honorable Matthew F. Kennelly

This document applies to:

All Cases in Which AbbVie is a Defendant

**PLAINTIFFS' STEERING COMMITTEE'S MOTION TO COMPEL PRODUCTION OF  
DEPONENT PERSONNEL FILES**

The Plaintiffs' Steering Committee hereby moves, pursuant to Rules 26 and 37 of Federal Rules of Civil Procedure for an order compelling Defendants AbbVie Inc. and Abbott Laboratories (collectively, "AbbVie") to produce personnel files for Kanika Angrawal, Brooke Kim, Christian Conradt, and all future employees designated for deposition in this matter. The grounds for this Motion are set forth in the Plaintiffs' Steering Committee Memorandum in Support of Motion to Compel Production of Deponent Personnel Files, filed contemporaneously herewith.

These documents are highly relevant to Plaintiffs' preparation for depositions of AbbVie witnesses. Therefore, Plaintiffs respectfully request an expedited briefing and hearing schedule. Plaintiffs are available to argue the motion, by telephone or in person, at the Court's earliest convenience.

Dated: September 24, 2015

Respectfully submitted,

/s/ Trent B. Miracle

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 24, 2015, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of this Court's electronic filing system. Parties may access this filing through the Court's system.

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